

FILED '10 DEC 17 16:32 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

Randall Lakefish

(Enter full name of plaintiff(s))

Plaintiff(s),

v.

Certegy Payment Recovery Services, Inc

(Enter full name of ALL defendant(s))

Defendant(s).

Civil Case No. 3:10-CV-1506-KI

(to be assigned by Clerk of the Court)

COMPLAINT

Jury Trial Demanded

☐ Yes

☒ No

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Randall Lakefish

Street Address: 2614 NE 32nd Place

City, State & Zip Code: Portland, OR 97212

Telephone No. 503.282.1301

Defendant No. 1 Name: Certegy Payment Recovery Services, Inc.
 Street Address: 3500 5th St.
 City, State & Zip Code: Northport, AL 35476-4723
 Telephone No. 800.873.5869

Defendant No. 2 Name: Principal Address
 Street Address: 11601 Roosevelt Boulevard North
 City, State & Zip Code: St. Petersburg, FL 33716
 Telephone No. _____

Defendant No. 3 Name: Registered Agent-CT Corporation System
 Street Address: 1200 South Pine Island Rd.
 City, State & Zip Code: Plantation, FL 33324
 Telephone No. 954.473.5503

Defendant No. 4 Name: Attorney-Robert M. Snee, P.C.
 Street Address: 5956 SE 111th Ave., POB 16866
 City, State & Zip Code: Portland, OR 97292
 Telephone No. 503.294.0411

II. JURISDICTION

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. A case involving the United States Constitution or federal laws or treaties is a federal question case. A case in which a citizen of one state sues a citizen of another state and the amount in damages claimed is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction (*check all that apply*)

☐ Federal Question

☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory, or treaty right is at issue?

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state of citizenship _____

Defendant(s) state(s) of citizenship _____

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

I began receiving telephone calls on June 1, 2010 from an unrecognized telephone number of 800.873.5869. Through an online search, I identified this number as one belonging to the defendant. Six calls were made to me by 6/8/10, however, I had not received written documentation from them. I made a request for documentation of the defendant on 6/8/10 via their website (see attached). They acknowledged my request by responding via email on 6/9/10 (see attached). On 6/9/10, I responded to this email requesting once again, documentation in the mail and advised that all telephone calls must cease until this information was provided (see attached). Although a request was also made of the defendant on 6/16/10 via certified mail (see attached), I failed to receive documentation from them. Instead, they continued to harass me by telephone. I made a good faith effort to resolve this matter via certified mail on 9/16/10 (see attached). In this correspondence, I advised the defendant that they had called me at least a dozen time and did not provide me with the information I requested. I received a letter from Lynn Cravey, SVP and Chief Division Counsel for FIS aka Fidelity National Information Services, Inc., the ultimate parent corporation. Ms. Cravey essentially refers to me as a liar. She alleged that documentation had been sent and refuted the fact that I had been called with the frequency stated.

IV. RELIEF

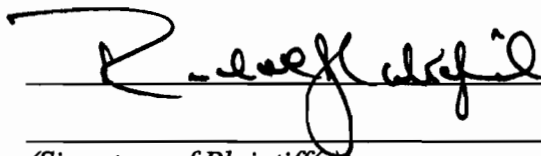
State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

It is my contention that the failure on the part of the defendant to provide documentation, despite their
claims to the contrary, and each telephone call, constitutes a violation of the FDCPA. The defendant
failed to accept accountability for the collection activity that I have proven, did in fact occur. I fervently
believe they are making erroneous claims when stating they provided me with the information I
requested. The defendant has also defamed my character by alleging that I have been dishonest in my
claims. The injuries I have suffered are the result of these actions.

Although I believe the defendant is responsible for the full amount of \$7500 plus costs as requested in
small claims proceedings, I will accept a good faith settlement of seventy five (75%) percent of this sum.
Thank you.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16 day of December, 2010.



(Signature of Plaintiff(s))

CERTIFICATE OF SERVICE BY US MAIL

I hereby certify that I served a copy of the foregoing

COMPLAINT

on the date indicated below by placing a true and correct copy of said document thereof in a sealed envelope, placing the envelope in the U.S. Mail, postage prepaid, said envelope addressed as follows:

Robert M. Snee, P.C.
5956 SE 111th Ave.
POBox 16866
Portland, Oregon 97292
Attorney for Defendant

Dated December 16, 2010

Randall J. Lakefish
Plaintiff